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Philadelphia, PA 19102
(215) 864-8064

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
	:	
Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

PLEASE TAKE NOTICE that as soon as counsel may be heard, Defendant Qualcomm Incorporated ("Defendant") will move before this Court for an order admitting Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq. of the law firm of Cravath, Swaine & Moore LLP, *pro hac vice* in this action.

In support of the motion, Defendant relies on the accompanying Affidavits of Karin A. DeMasi, Rodrigo F. Pintos-Lopez, Matthew P. Anderson, and David Litterine-Kaufman.

Defendant respectfully submits that no brief is necessary in connection with this motion, in as much as the bases of this application are set forth in the accompanying Affidavits.

Dated: March 28, 2008

McCARTER & ENGLISH, LLP

By: s/ William J. O'Shaughnessy

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UNITED STATES DISTRICT COURT
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Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

**CERTIFICATION OF WILLIAM J. O'SHAUGHNESSY
IN SUPPORT OF *PRO HAC VICE* ADMISSION OF
KARIN A. DEMASI, ESQ., RODRIGO F. PINTOS-LOPEZ, ESQ.,
MATTHEW P. ANDERSON, ESQ., AND DAVID LITTERINE-KAUFMAN, ESQ.**

WILLIAM J. O'SHAUGHNESSY, of full age, certifies as follows:

1. I am a member of the bar of the State of New Jersey and of McCarter & English, LLP, counsel for Defendant Qualcomm Incorporated in this action.

2. I make this Certification in support of the application of Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq. for admission to the bar of this Court *pro hac vice*.

3. Affidavits from Ms. DeMasi, Mr. Pintos-Lopez, Mr. Anderson, and Mr. Litterine-Kaufman in support of their respective applications for admission to the bar of this Court *pro hac vice* have also been submitted.

4. Ms. DeMasi, Mr. Pintos-Lopez, Mr. Anderson, and Mr. Litterine-Kaufman have been advised of their obligations to comply with the Rules of Professional Conduct adopted by the New Jersey Supreme Court, and of Local Rule 101.1(c) which governs the admission of counsel *pro hac vice*.

5. Ms. DeMasi, Mr. Pintos-Lopez, Mr. Anderson, and Mr. Litterine-Kaufman will be associated with attorneys from the firm of McCarter & English, LLP in the defense of this matter, and a member of McCarter & English, LLP will sign all pleadings, briefs, and other papers filed with the Court.

6. Our adversary, Broadcom Corporation, through its attorney, Kate Saxton of Wilmer Cutler Pickering Hale & Dorr LLP, has consented to the *pro hac vice* admission of Ms. DeMasi, Mr. Pintos-Lopez, Mr. Anderson, and Mr. Litterine-Kaufman.

I certify under penalty of perjury that the foregoing is true and correct.

s/William J. O'Shaughnessy
William J. O'Shaughnessy

DATED: March 28, 2008

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Attorneys for Defendant Qualcomm Incorporated.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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	:	
Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF KARIN A. DeMASI IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Karin A. DeMasi, being duly sworn, deposes and says:

1. I am a member of the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I make this

Affidavit in support of the motion of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

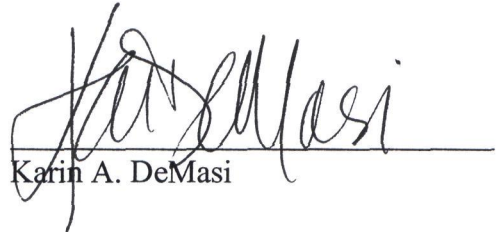
3. I am a 1996 graduate of the University of Pennsylvania Law School. I was admitted to practice in the State of Pennsylvania in 1996 and in the State of New York in 1997. I am also admitted to practice before the United States District Court for the Southern District of New York (1997), the United States District Court for the Eastern District of New York (1997) and the United States Court of Appeals for the Sixth Circuit (2007).

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.



Karin A. DeMasi

Sworn and subscribed to before me,
a notary public of the State of New York,
this 25th day of March, 2008.



BETSY SCHULMAN
Notary Public, State of New York
No. 01SC6144504
Qualified in Westchester County
Certificate Filed in New York County
Commission Expires April 24, 2010

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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
	:	Civil Action No. 05-3350 (MLC) (JJH)
Plaintiff,	:	
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF RODRIGO F. PINTOS-LOPEZ IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Rodrigo F. Pintos-Lopez, being duly sworn, deposes and says:

1. I am an attorney associated with the law firm of Cravath, Swaine & Moore LLP.

My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019. I

make this Affidavit in support of the motion of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

3. I am a 2003 graduate of the University of Melbourne Law School and a 2006 graduate of Harvard Law School. I was admitted to practice in the State of New York in 2007.

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

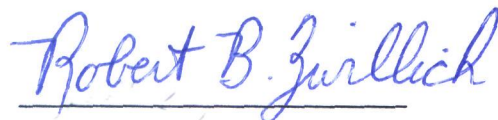
6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers’ Fund for Client Protection.



Rodrigo F. Pintos-Lopez

Sworn and subscribed to before me,
a notary public of the State of New York,
this 6 day of March, 2008.



ROBERT B. ZWILLICH
Notary Public, State of New York
No. 01ZW4630959
Qualified in New York County
Commission Expires October 31, 2010

William J. O'Shaughnessy
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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
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Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF MATTHEW P. ANDERSON IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Matthew P. Anderson, being duly sworn, deposes and says:

1. I am an attorney associated with the law firm of Cravath, Swaine & Moore LLP.

My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019.

I make this Affidavit in support of the motion of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.


3. I am a 2007 graduate of the University of Chicago Law School. I was admitted to practice in the State of New York in 2008.

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers’ Fund for Client Protection.


Matthew P. Anderson

Sworn and subscribed to before me,
a notary public of the State of New York,
this 6th day of March, 2008.



DORIS SCHULTDT
Notary Public, State of New York
No. 31-4638498
Qualified in New York County
Commission Expires March 30, 2010

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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
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Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF DAVID LITTERINE-KAUFMAN IN SUPPORT OF
ADMISSION *PRO HAC VICE***

David Litterine-Kaufman, being duly sworn, deposes and says:

1. I am an attorney associated with the law firm of Cravath, Swaine & Moore LLP.

My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019.

I make this Affidavit in support of the motion of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

3. I am a 2007 graduate of the New York University School of Law. I was admitted to practice in the State of New York in 2008.

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.


David Litterine-Kaufman

Sworn and subscribed to before me,
a notary public of the State of New York,
this 27th day of March, 2008.



BETSY SCHULMAN
Notary Public, State of New York
No. 01SC6144504
Qualified in Westchester County
Certificate Filed in New York County
Commission Expires April 24, 2010

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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
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Plaintiff,	:	Civil Action No. 05-3350 (MLC) (JJH)
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

CERTIFICATION OF SERVICE

RICHARD HERNANDEZ, of full age, certifies as follows:

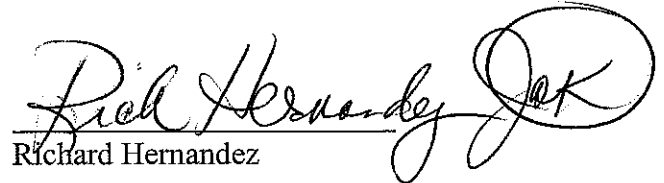
1. I am an attorney at law of the State of New Jersey and am associated with the firm of McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated.

2. On March 28, 2008, I caused to be delivered by ECF copies of the forgoing to the following:

Kate Saxton, Esq.
Wilmer Cutler Pickering Hale & Dorr LLP
60 State Street
Boston, Massachusetts 02109

Steven John Kaiser, Esq.
Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Richard Hernandez

DATED: March 28, 2008

William J. O'Shaughnessy
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v.	:	
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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

ORDER GRANTING ADMISSION *PRO HAC VICE*

This matter having been opened to the Court by McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated, seeking an Order admitting Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq., attorneys at law of the State of New York *pro hac vice*, and the local counsel for Defendant (McCarter & English, LLP) having represented that Plaintiff has no objection to the entry of the within Order;

IT IS on this _____ day of _____, 2008,

ORDERED as follows:

1. Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq. be and are hereby admitted *pro hac vice* to appear in this matter for all purposes on behalf of Defendant Qualcomm Incorporated.

2. Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq. are required to abide by the Rules governing this Court, including all disciplinary rules, and to notify the Court immediately of any matter affecting his or her standing at the bar of any other court.

3. Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq. are deemed to consent to the appointment of the Clerk of the Court as agent upon whom service of process may be made for all actions against him or her or their firm that may arise out of their participation in this matter.

4. William J. O'Shaughnessy, Esq. of the firm of McCarter & English, LLP, and a member of the bar of this Court, has entered an appearance in this case and shall be counsel of record in accordance with Local Civil Rule 101.1(c)(3).

5. In accordance with Local Civil Rule 101.1(c)(2), Karin A. DeMasi, Esq., Rodrigo F. Pintos-Lopez, Esq., Matthew P. Anderson, Esq., and David Litterine-Kaufman, Esq. will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a).

Honorable John J. Hughes, U.S.M.J.